

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

EMPLOYBRIDGE, LLC, a California
Limited Liability Company, and
EMPLOYMENT SOLUTIONS
MANAGEMENT, INC., a Georgia
Corporation,

Plaintiffs,

v.

Case No. 1:16-cv-00833 WJ/KK

RIVEN ROCK STAFFING, LLC, a Nevada
Limited Liability Company, LARRY SHAUN
SHEPHERD, an individual, CATHERINE
OLINGER, an individual, TERRY MILLER,
an individual, TIMOTHY JAQUEZ, an
individual, and Does 1 through 25, inclusive,

Defendants.

**DEFENDANT RIVEN ROCK STAFFING, LLC'S FIRST SET
OF INTERROGATORIES TO PLAINTIFFS**

Comes now Riven Rock Staffing, LLC, through its counsel of record and pursuant to Fed. R. Civ. P. 33 requests that Plaintiffs answer the following interrogatories within thirty (30) days of service at the law offices of Moody & Warner, P.C., 4169 Montgomery Blvd N.E., Albuquerque, New Mexico 87109.

INTERROGATORY NO. 1: Please identify all material facts in support of the allegation in Paragraph 25 of the Amended Complaint that Riven Rock Staffing, LLC has used confidential, proprietary and/or trade secrets to “to lure or attempt to lure away EmployBridge employees,” the date on which each unlawful act took place, the manner in which the information was used by Riven Rock Staffing, LLC on each occasion, and the identity of all material witnesses with knowledge or information of each unlawful act.

ANSWER:

INTERROGATORY NO. 2: Please identify all material facts in support of the allegation in Paragraph 26 of the Amended Complaint that Riven Rock Staffing, LLC has used confidential, proprietary and/or trade secrets to “to lure or attempt to lure away EmployBridge customers,” the date on which each unlawful act took place, the manner in which the information was used by Riven Rock Staffing, LLC on each occasion, the person(s) involved in each unlawful act and the identity of all material witnesses with knowledge or information of each unlawful act.

ANSWER:

INTERROGATORY NO. 3: Please identify all material facts in support of the allegation in Paragraph 79 of the Amended Complaint that Shepherd and Jacquez passed along EmployBridge’s confidential information to Riven Rock Staffing, LLC, the date on which each unlawful act took place, the manner in which the information was passed along on each occasion, and the identity of all material witnesses with knowledge or information of each unlawful act.

ANSWER:

INTERROGATORY NO. 4: Please identify all material facts in support of the allegation in Paragraph 120 of the Amended Complaint that Riven Rock Staffing, LLC is interfering and/or continuing to interfere with EmployBridge’s contractual relationships with its customers, the date on which each act of interference took place, the name of the customer, the manner in which each unlawful act took place, the person(s) involved in each unlawful act and the identity of all material witnesses with knowledge or information of each unlawful act.

ANSWER:

INTERROGATORY NO. 5: Please identify all material facts in support of the allegation in Paragraph 144 of the Amended Complaint that Riven Rock Staffing, LLC is interfering and/or continuing to interfere with EmployBridge's contractual relationship with Jacquez, the date on which each act of interference took place, the manner in which each unlawful act took place, the person(s) involved in each unlawful act and the identity of all material witnesses with knowledge or information of each unlawful act.

ANSWER:

INTERROGATORY NO. 6: Please identify all material facts in support of the allegation in Paragraph 153 of the Amended Complaint that Riven Rock Staffing, LLC has interfered and continues to interfere with EmployBridge's relationships with its customers through solicitation, the date on which each unlawful act took place, the customer who was solicited, the manner in which each unlawful act took place, the person(s) involved in each unlawful act and the identity of all material witnesses with knowledge or information of each unlawful act.

ANSWER:

INTERROGATORY NO. 7: Please identify all material facts in support of the allegation in Paragraph 171 of the Amended Complaint that Riven Rock Staffing, LLC has threatened to disclose and/or use, and/or has disclosed or used EmployBridge's trade secrets, the date on which each unlawful act took place, the manner in which each unlawful act took place, the person(s) involved in each act of threatening, using or disclosing trade secrets, and the identity of all material witnesses with knowledge or information of each unlawful act.

ANSWER: